

DONALD S. HONIGMAN (SBN 106914)
ELIZABETH D. RHODES (SBN 218480)
KENNEY & MARKOWITZ L.L.P.
255 California Street, Suite 1300
San Francisco, CA 94111
Telephone: (415) 397-3100
Facsimile: (415) 397-3170
Email: dhonigman@kennmark.com
erhodes@kennmark.com

Attorneys for Defendant
AMERICAN AIRLINES, INC. (erroneously sued herein as AMERICAN AIRLINES)

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND – E-FILING

BORIS KHLEVNER,

Plaintiff,

v.

AMERICAN AIRLINES, and DOES 1 to
50,

Defendant.

CASE NO. 4:07-cv-2797 CW

**STIPULATION TO MODIFY
PRETRIAL SCHEDULE TO
ACCOMMODATE VOLUNTARY
MEDIATION; ORDER**

I. BACKGROUND

This case arises from plaintiff's claims of injury arising from an alleged incident involving a food cart while a passenger on an American Airlines flight on November 26, 2004. This case is set for trial on November 10, 2008. Parties desire to continue the mediation deadline ordered by this Court to occur on January 31, 2008, or as soon thereafter as is possible.

This extension is necessary due to the parties' inability to complete the deposition of plaintiff and plaintiff's disclosed witnesses prior to that date as a result of the significant trial schedule of plaintiff's counsel, availability of counsel and availability of the parties. Plaintiff's deposition is currently scheduled to occur in March 2008. The parties are cooperatively working to

1 schedule mediation with the previously agreed-upon private mediator Honorable Alfred Chiantelli
2 (Retired). Parties desire to continue the mediation deadline to May 31, 2008 or to another date
3 amenable to this Court's calendar. No other changes are requested.

4 II. STIPULATION

5 For the reasons set forth above, the parties hereby stipulate that the current pretrial
6 deadline to mediate this matter be modified as set forth below, and respectfully request this
7 Court's approval and Order to the same effect. The other dates set by this Court's September 21,
8 2007 Case Management Conference orders remain unchanged by this stipulation. The deadlines,
9 including the desired new mediation deadline and the unchanged deadlines are as follows:

11 Event	Current Date	New Date
12 Mediation Cut-Off	January 31, 2008 or as 13 soon thereafter as 14 mediator schedule allows	May 31, 2008
15 Non-expert discovery cutoff	July 31, 2008	Same
16 Further Case Management Conference	July 31, 2008	Same
17 Deadline to disclose experts	August 11, 2008	Same
18 Deadline to disclose rebuttal experts	August 25, 2008	Same
19 Expert discovery cutoff	September 29, 2008	Same
20 Last hearing date for dispositive motions	July 31, 2008	Same
21 Final Pre-Trial Conference	October 28, 2008	Same
Trial	November 10, 2008	Same

22 So Stipulated:

23 DATED: March __, 2008

LAW OFFICES OF BORIS E. EFRON

25 By: _____

26 GAIL J. LAMCHICK
Attorneys for Plaintiff
BORIS KHLEVNER

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Kenney
&
Markowitz
L.L.P.

DATED: March __, 2008

KENNEY & MARKOWITZ L.L.P

By: _____

DONALD S. HONIGMAN
ELIZABETH D. RHODES
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ORDER

Good cause appearing therefore, it is hereby ordered that the mediation deadline ordered in the September 21, 2007 Case Management Conference orders is continued to May 31, 2008, and the other deadlines and events in the orders are unchanged, as set forth below:

Event	Current Date	New Date
Mediation Cut-Off	January 31, 2008 or as soon thereafter as mediator schedule allows	May 31, 2008
Non-expert discovery cutoff	July 31, 2008	Same
Further Case Management Conference	July 31, 2008	Same
Deadline to disclose experts	August 11, 2008	Same
Deadline to disclose rebuttal experts	August 25, 2008	Same
Expert discovery cutoff	September 29, 2008	Same
Last hearing date for dispositive motions	July 31, 2008	Same
Final Pre-Trial Conference	October 28, 2008	Same
Trial	November 10, 2008	Same

SO ORDERED.

3/13/08

Dated: _____



CLAUDIA WILKEN
United States District Court Judge

**Kenney
&
Markowitz
L.L.P.**